

1 Jeffrey C. Block, *pro hac vice*
2 Jacob A. Walker (SBN 271217)
Block & Leviton LLP
3 260 Franklin Street, Suite 1860
Boston, MA 02110
4 (617) 398-5600 phone
jeff@blockleviton.com
5 jake@blockleviton.com

Vincent Cheng (SBN 230827)
Block & Leviton LLP
100 Pine Street, Suite 1250
San Francisco, CA 94111
(510) 543-0489 phone
vincent@blockleviton.com

6 *Attorneys for Lead Plaintiff*
Rick Keiner and the Class

7
8 *Additional Counsel on Signature Page*

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10 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
11 OAKLAND DIVISION

12 In re LYFT INC. SECURITIES LITIGATION

MASTER FILE NO. 4:19-CV-02690-HSG
**JOINT STIPULATION TO AMEND
EXHIBIT A-1 TO LEAD PLAINTIFF'S
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

13 This Document Relates to:

14 ALL ACTIONS

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1 Pursuant to Civil Local Rule 7-12, Lead Plaintiff Rick Keiner (“Lead Plaintiff”) and
2 Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts, Prashant (Sean) Aggarwal,
3 Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes
4 Wilderotter (“Defendants,” and together with Lead Plaintiff the “Parties”), through their counsel,
5 submit the following Joint Stipulation to Amend Exhibit A-1 to Lead Plaintiff’s Motion for
6 Preliminary Approval of Class Action Settlement.

7 WHEREAS, on June 16, 2022, Lead Plaintiff filed his Notice of Motion, Unopposed
8 Motion for Preliminary Approval of Settlement, and Memorandum of Points and Authorities in
9 Support Thereof (the “Motion for Preliminary Approval”) (ECF No. 249);

10 WHEREAS, the Motion for Preliminary Approval included Exhibit A-1, a proposed
11 Notice of (I) Pendency of Proposed Settlement; (II) Motion for an Award of Attorneys’ Fees and
12 Reimbursement of Litigation Expenses; and (III) Settlement Hearing (the “Settlement Notice”)
13 (ECF No. 249-4);

14 WHEREAS, on September 15, 2022, the Court held a hearing on the Motion for
15 Preliminary Approval;

16 WHEREAS, on September 27, 2022, Lead Plaintiff filed an amended version of the
17 Settlement Notice (ECF Nos. 276-5, 275-6);

18 WHEREAS, on November 17, 2022, the Court held a second hearing on the Motion for
19 Preliminary Approval and suggested certain additional changes to the paragraph in the
20 Settlement Notice referencing a related case in California Superior Court captioned *In re Lyft,*
21 *Inc. Securities Litigation*, Case No. CGC-19-575293 (the “State Action”);

22 WHEREAS, the Parties met and conferred on November 17, 2022, following the hearing,
23 and agreed to amend the Settlement Notice;

24 WHEREAS, attached hereto as Exhibit A-1 is the second amended Settlement Notice;

25 WHEREAS, attached hereto as Exhibit A-1(a) is the second amended Settlement Notice,
26 with changes shown in redline;

27 NOW, THEREFORE, the Parties hereby stipulate that the Settlement Notice be amended,

1 as reflected in the attached Exhibits A-1 and A-1(a).

2 Stipulated and agreed to by:

3 Date: November 22, 2022

5 **BLOCK & LEVITON LLP**

6 /s/ Jeffrey C. Block

Jeffrey C. Block (*Pro Hac Vice*)
7 Jacob A. Walker (CA Bar. No. 271217)
260 Franklin Street, Suite 1860
Boston, MA 02110
jeff@blockleviton.com
jake@blockleviton.com

10 *Counsel for Lead Plaintiff and the Class*

5 **LATHAM & WATKINS LLP**

6 /s/ Colleen C. Smith

Colleen C. Smith (CA Bar. No. 231216)
12670 High Bluff Drive
San Diego, CA 92130
Colleen.Smith@lw.com

Matthew Rawlinson (CA Bar. No. 231890)
140 Scott Drive
Menlo Park, CA 94025
T: (650) 328-4600 / F: (650) 463-2600
matthew.rawlinson@lw.com

Elizabeth Deeley (CA Bar. No. 230798)
505 Montgomery Street, Suite 2000
San Francisco, CA 94111
T: (415) 391-0600 / F: (415) 395-8095
elizabeth.deeley@lw.com

Andrew B. Clubok (*pro hac vice*)
Susan E. Engel (*pro hac vice*)
555 Eleventh Street, NW, Suite 1000
Washington, D.C. 20004
T: (202) 637-2200 / F: (202) 637-2201
andrew.clubok@lw.com
susan.engel@lw.com

19 *Counsel for Defendants Lyft, Inc., Logan*
20 *Green, John Zimmer, Brian Roberts,*
21 *Prashant Aggarwal, Ben Horowitz,*
Valerie Jarrett, David Lawee, Hiroshi
Mikitani, Ann Miura-Ko, and Mary Agnes
Wilderotter

25 **FILER'S ATTESTATION**

26 Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in
27 the filing of the document has been obtained from all of the signatories above.

1 Dated: November 22, 2022

/s/ Jeffrey C. Block
Jeffrey C. Block

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